

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

- - - - -x

UNITED STATES OF AMERICA :

-v- :

WILLIAM YOUNG, :
a/k/a "Chip," :

Defendant. :

- - - - -x

USDC SDNY
DOCUMENT
ELECTRONICALLY FILED
DOC #:
DATE FILED: Nov 16 2007

INDICTMENT

07 Cr.
07 CRIM1052

COUNT ONE

The Grand Jury charges:

1. From at least in on or about April 2007, up to and including in or about May 2007, in the Southern District of New York and elsewhere, WILLIAM YOUNG, a/k/a "Chip," the defendant, and others known and unknown, unlawfully, intentionally, and knowingly did combine, conspire, confederate and agree together and with each other to violate the narcotics laws of the United States.

2. It was a part and an object of the conspiracy that WILLIAM YOUNG, a/k/a "Chip," the defendant, and others known and unknown, would and did distribute and possess with intent to distribute a controlled substance, to wit, 5 grams and more of methamphetamine, its salts, isomers, and salts of its isomers, in violation of Sections 812, 841(a)(1) and 841(b)(1)(B) of Title 21, United States Code.

Overt Acts

3. In furtherance of the conspiracy and to effect the illegal object thereof, the following overt acts, among others, were committed in the Southern District of New York and elsewhere:

a. In or about April 2007, WILLIAM YOUNG, a/k/a "Chip," the defendant, provided approximately one half-ounce of crystal methamphetamine to a co-conspirator not named as a defendant herein ("CC-1") in Phoenix, Arizona.

b. In or about April 2007, CC-1 mailed approximately one ounce of crystal methamphetamine from Phoenix, Arizona to Manhattan, New York.

c. In or about May 2007, YOUNG provided approximately one half-ounce of crystal methamphetamine to CC-1 in Phoenix, Arizona.

d. In or about May 2007, CC-1 mailed approximately three quarters of an ounce of crystal methamphetamine from Phoenix, Arizona to Manhattan, New York.

(Title 21, United States Code, Section 846.)

FORFEITURE ALLEGATION

4. As a result of committing the foregoing controlled substance offense alleged in Count One of this Indictment, WILLIAM YOUNG, a/k/a "Chip," the defendant, shall forfeit to the United States pursuant to 21 U.S.C. § 853, any and all property

constituting or derived from any proceeds the defendant obtained directly or indirectly as a result of the offense and any and all property used or intended to be used in any manner or part to commit and to facilitate the commission of the violation alleged in Count One of this Indictment.

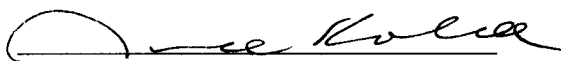
5. If any of the above-described forfeitable property, as a result of any act or omission of the defendant:

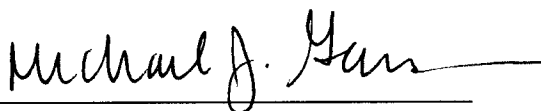
- (i) cannot be located upon the exercise of due diligence;
- (ii) has been transferred or sold to, or deposited with, a third party;
- (iii) has been placed beyond the jurisdiction of the court;
- (iv) has been substantially diminished in value;
or
- (v) has been commingled with other property which cannot be divided without difficulty;

it is the intention of the United States, pursuant to Title 18, United States Code, Section 853(p), to seek forfeiture of any

other property of the defendant up to the value of the
forfeitable property.

(Title 21, United States Code, Section 853.)


FOREPERSON


MICHAEL J. GARCIA
United States Attorney

Form No. USA-33s-274 (Ed. 9-25-58)

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

UNITED STATES OF AMERICA

- v -

**WILLIAM YOUNG,
a/k/a "Chip,"**

Defendant.

INDICTMENT

07 Cr. ____

(Title 21, United States Code,
Sections 846 and 853.)

MICHAEL J. GARCIA
United States Attorney.

A TRUE BILL


Foreperson.

Nov. 16, 2007
Indictment filed
Case assigned to Judge Hellerstein
Freeman, USM 2